

**Exhibit A**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,  
  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**[PROPOSED] ORDER DENYING MOTION FOR  
IMMEDIATE CLAIM PAYMENT AND TO LIFT AUTOMATIC STAY**

Upon the motions (the “**Motions**”) of Deborah Clonts requesting that this Court direct that she be paid by the estates of the debtors and debtors in possession herein (the “**Debtors**”) now, in advance of the confirmation and effective date of a chapter 11 plan in these cases, and in full, with respect to her personal injury proofs of claim filed in these cases (the “**Claims**”);<sup>2</sup> and the Court having jurisdiction to consider the matters raised in the Motions pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.), as a core proceeding under 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and upon the Debtors’ omnibus objection to the Motions; and upon the record of the hearing held by the Court on the Motions on January 20, 2021; and, after due deliberation, and for the reasons stated by the Court in its bench

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717), and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<sup>2</sup> The Claims include claim numbers 10231, 67036, 614341, 615218, and 615270.

ruling at the hearing, the Court having determined that the payment in full of the Claims but not all claims similarly situated to the Claims before the confirmation and effective date of a chapter 11 plan in these cases would violate the fundamental Bankruptcy Code principles of similar treatment of similar claims and the resolution and treatment of general unsecured claims under a chapter 11 plan and is not warranted by any exception to such principles; now, therefore, IT IS HEREBY ORDERED THAT:

1. The Motions are denied.
2. Except as expressly set forth in this Order, nothing contained herein shall be an admission or waiver of the substantive or procedural rights, remedies, claims, or defenses of, or otherwise prejudice the rights of any of the parties in these chapter 11 cases, whether at law or equity, with respect to the Claims.

Dated: \_\_\_\_\_, 2021  
White Plains, New York

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THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE